TABLE OF CONTENTS

TAB	LE OF CONTENTS	<u>Page</u> i
APPI	ENDIX OF EXHIBITS	iii
	INTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION SUMMARY JUDGMENT	1
	INTIFF'S MEMORANDUM IN OPPOSITION TO DEFENDANT'S MOTION SUMMARY JUDGMENT	1
INTF	RODUCTION	1
PLA	INTIFF'S FORECAST OF EVIDENCE	2
	NDARDS REGARDING SUMMARY JUDGMENT	11
	NDARDS REGARDING PROOF OF UNLAWFUL EMPLOYMENT CRIMINATION	13
ARG	GUMENT	14
A.	PLAINTIFF HAS PRODUCED SUFFICIENT EVIDENCE OF EMPLOYMENT DISCRIMINATION AND PRETEXTUAL NATURE OF DEFENDANT'S ALLEGED NON-DISCRIMINATORY REASONS	14
В.	PLAINTIFF HAS SUFFICIENT EVIDENCE TO ESTABLISH RACIAL AND NATIONAL ORIGIN BASED HOSTILE WORK ENVIRONMENT WHICH PLAINTIFF AND ANY REASONABLE PERSON WILL FIND UNREASONABLE AND ABUSIVE	29
C.	PLAINTIFF HAS PROFERRED SUFFICIENT EVIDENCE TO ESTABLISH CLAIM OF CONSTRUCTIVE DISCHARGE	
D.	DEFENDANT HAS FAILED TO SHOW A VALID DISCLAIMER OF CONTRACTUAL LIABILITY BASED ON ITS EMPLOYEE HANDBOOK	36

E.	PLAINTIFF HAS STATED FACTS SUFFICIENT TO	
	DEMONSTRATE INTENTIONAL INFLICTION OF	
	EMOTIONAL DISTRESS UNDER MARYLAND LAW	37
CON	CLUSION	39

PLAINTIFF'S INDEX OF EXHIBITS

EXHIBIT	<u>NUMBER</u>
Plaintiff's Affidavit	1
Plaintiff's Deposition	2
Medical Lab. Tech. Position Description	3
Plaintiff's Associate Degree in Medical Laboratory Technology	4
Plaintiff's Certificate of Achievement as Med. Lab. Technician	5
SAH Lab Training Evaluation for Plaintiff	6
SAH Job Description Evaluation for Plaintiff	7
Competency Assessment for Plaintiff	8
Planter Bench Competency Test Result for Plaintiff	9
Evening Planter Training by Plaintiff for Mr. Roberts	10
January 5, 2006 Verbal Warning for Plaintiff	11
February 2, 2006 Documented Verbal Warning for Plaintiff	12
February 14, 2006 Beubendorf Email to Ringgold	13
February 8, 2006 Suspension Counseling Report for Plaintiff	14
February 21, 2006 retraction of error by Defendant	15
February 17, 2006 Discrimination Complaint by Plaintiff	16
Ms. Parikh Report on Plaintiff's training	17
EAP Prime Confirmation for Plainitff	18
March 7, 2006 Unsigned Note by Ms. Kinch	19
March 12, 2006 Email from Ms. Kinch	20

Case 1:08-cv-00943-CCB Document 25-2 Filed 05/15/09 Page 4 of 5

Plaintiff's Letter of Resignation
Personnel Action Report for Plaintiff
Plaintiff's Charge of Discrimination
Defendant's Position Statement to Baltimore Comm. Relations
BCRC's Result of Interviews
BCRC's Letter to Defendant's Previous Counsel
BCRC's Memo, Re intent to Issue Probable Cause Finding
Plaintiff's Request for Notice of Right
Notice of Right
Ms. Weiger Deposition
Ms. Kinch Deposition
Ms. Harrid Deposition
Mr. Roberts Deposition
Defendant's Answers to Plaintiff's Interrogatories
Defendant's Response to Production of Documents
Defendant's Employee Handbook, February 2005
Defendant's Paid Time Off Policy
Defendant's Voluntary Resignation Policy
March 10, 2006 Pay Check for Plaintiff
Defendant's Employee's Payroll History
Defendant's Sexual Harassment Policy
Plaintiff's Notice of Deposition for Defendant

Defendant's Microbiology Associates, Ju	ly 21, 2004 to March	10, 2008	43
Sealed Exhibits			44-49